

## REMARKS

Claims 1-45 remain pending in the present application. Applicant has amended Claims 1, 6, 10-13, 18, 22, 25, 30, 33-36, 40, and 43-45 to clarify claimed subject matter and/or correct informalities. The specification and drawings support these claim amendments at least at pages 1, 3, 7, 14, Figures 1, and 2. Therefore, these revisions introduce no new matter.

Claims 1-45 are for consideration upon entry of the present Amendment. Applicant requests favorable consideration of this response and allowance of the subject application based on the following remarks.

### *Statement of Substance of Interview*

Applicant appreciates the Office's participation in a telephonic conference of February 6, 2007. Applicant appreciates the Examiner's assistance in advancing the prosecution.

During the interview, the claimed subject matter of the application and the Joachims reference were discussed. In particular, Applicant presented arguments along the lines of those set forth below in the section entitled "Claim Rejections 35 U.S.C. §103". Specifically, Applicant presented arguments as to how the subject matter in the application contains features, such as expanded term(s), content similarity, expanded similarity measurements, and confidence value.

Also discussed during the interview were proposed amendments to the claims. In the interest of expediting prosecution of the application, and without conceding the propriety of the rejection, Applicant proposed to amend each of the independent claims to further clarify features of Applicant's claimed subject matter.

The Examiner indicated that an updated search would be needed, and requested that the proposed amendments be presented in writing. Applicant is submitting the amendments in writing in the Response to the Office Action.

### **Objections**

The Office has objected to the specification page 1, paragraph [0003], because of the missing related U.S. Patent Application Number. Applicant has amended the specification so this objection is now moot.

The Office has objected to Claims 1, 6, 10-13, 18, 22, 25, 30, 33-36, 40, and 43-45 as not specific. In particular, these claims recited the terms “and/or”. Applicant has amended these claims to clarify claimed subject matter. Accordingly, these objections are now moot.

### **Claim Rejections 35 U.S.C. §101**

The Office states Claims 1-20 stand rejected under 35 U.S.C. §101 as being allegedly directed to non-statutory subject matter. However, Applicant points out that the Office provides explanations for rejecting independent **Claims 1, 13, 25, and 36** under §101. Therefore, Applicant will respond to the independent claim rejections.

In the interest of expediting prosecution of the application, and without conceding the propriety of the rejection, Applicant has amended **independent Claim 1** to further clarify Applicant’s subject matter for a practical and useful purpose. For example, amended Claim 1 recites in part, “analyzing the confidence value to identify the bid term(s); and using the bid term(s) identified to increase traffic to a site to obtain site exposure”. Support may

be found at least at pages 1, 3, 7, 14, Figures 1, and 2. Again, no new matter has been introduced.

**Independent Claims 13, 25, and 36** have been amended and are directed to a computer-readable media and computing devices. Each claim is allowable for reasons similar to those discussed above with respect to Claim 1.

**Dependent Claims 2-12, 14-24, 26-35, and 37-45** depend directly or indirectly from one of independent Claims 1, 13, 25, and 36 and are allowable by virtue of this dependency. These claims comply with 35 U.S.C. §101 and as a result, the rejections are now moot.

**Claim Rejections 35 U.S.C. §103**

Claims 1-45 stand rejected under 35 U.S.C. §103(a) as being unpatentable over a publication titled "Optimizing Search Engines using Clickthrough Data", issued to Thorsten Joachims, (hereinafter "Joachims"), further in view of U.S. Publication No. 6,167,398 issued to Wyard et al. (hereinafter "Wyard"). Applicant respectfully traverses the rejection.

Without conceding the propriety of the stated rejections, and only to advance the prosecution of this application, Applicant has amended **independent Claim 1**, to clarify further features of the subject matter. **Independent Claim 1** as amended, recites:

A method for verifying relevance between terms and Web site contents, the method comprising:

retrieving site contents from a bid URL;

**formulating expanded term(s) comprising at least one of semantically or contextually related to bid term(s), which are mined from a search engine in view of high-frequency of occurrence historical query terms;**

generating content similarity and expanded similarity measurements from respective combinations of the bid term(s), the site contents, and the expanded terms, wherein the similarity measurements

indicate relatedness between respective ones of the bid term(s), site contents, or expanded terms;

calculating category similarity measurements between the expanded terms and the site contents in view of a similarity classifier, wherein the similarity classifier has been trained from mined web site content associated with directory data;

**calculating a confidence value from combined ones of multiple similarity measurements, wherein the combined ones comprise content, expanded, and category similarity measurements, wherein the confidence value provides an objective measure of relevance between the bid term(s) and the site contents;**

analyzing the confidence value to identify the bid term(s); and  
using the bid term(s) identified to increase traffic to a site to obtain site exposure.

#### References Fail to Teach or Suggest Features of Claim 1

First, Applicant asserts the Office has failed to establish a *prima facie* case of obviousness. For example, Joachims and Wyard fail to teach or suggest “formulating expanded term(s) comprising at least one of semantically or contextually related to bid term(s), which are mined from a search engine in view of high frequency of occurrence historical query terms; calculating a confidence value from combined ones of multiple similarity measurements, wherein the combined ones comprise content, expanded, and category similarity measurements, wherein the confidence value provides an objective measure of relevance between the bid term(s) and the site contents”, as recited in Claim 1.

Joachims is directed to optimizing the retrieval quality of search engines using clickthrough data (Abstract). In Joachims, maximizing (2) is equivalent to minimizing the average rank of the relevant documents (page 135, col. 2, 33-35). Equation (6) shows the problem of learning a ranking function (page 135, col. 2, equation 6). In contrast, Applicant’s Claim 1 recites, “formulating expanded term(s) comprising at least one of semantically or contextually related to bid term(s), which are mined from a search engine in

**Conclusion**

Claims 1-45 are in condition for allowance. Applicant respectfully requests reconsideration and allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, Applicant requests that the Office contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Lee & Hayes, PLLC  
421 W. Riverside Avenue, Suite 500  
Spokane, WA 99201

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By: Shirley Lee Anderson  
Shirley Lee Anderson  
Reg. No. 57,763  
(509) 324-9256 ext. 258